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CLERK U.S. DISTRICT COURT
CENTRAL DIST. OF CALIF.
LOS ANGELES

BY:

UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

June 2014 Grand Jury

CR 15 00206

11 UNITED STATES OF AMERICA,

No. CR 14-

12 Plaintiff,

I N D I C T M E N T

13 v.

14 OSCAR NOE MEDINA GONZALEZ,
 aka "Pan,"
 aka "El Panu,"
 LUIS FERNANDO MEZA
 GONZALEZ,
 aka "Ferras,"
 aka "Ferrari,"
 CARLOS ROBERTO GONZALEZ
 MANJARREZ,
 aka "Chino,"
 aka "Cali,"
 aka "Kali,"
 NAYAR JOSUE BELTRAN CAMPOS,
 aka "NY New,"
 CHRISTIAN JARED MARTELL
 OBESO,
 aka "FKITO,"
 aka "Flakito,"
 FNU LNU,
 aka "Retro,"
 HERACLIA VALENZUELA
 CHAPARRO,
 aka "Lorena,"
 JOSE EDGAR ASTORGA HEREDIA,
 aka "Edgarcito,"
 LUIS ENRIQUE SANCHEZ ROCHA,
 aka "Los Dos Barones,"
 aka "El Zurdo,"

[21 U.S.C. § 963: Conspiracy to Import Controlled Substances; 21 U.S.C. § 846: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances; 21 U.S.C. §§ 841(a)(1), 841(b)(1)(A), 841(b)(1)(B), 841(b)(1)(C): Possession with Intent to Distribute and Distribution of Controlled Substances; 18 U.S.C. § 924(c)(1)(B)(i): Possession of a Firearm in Furtherance of a Drug Trafficking Crime; 18 U.S.C. § 1956(h): Conspiracy to Launder Monetary Instruments; 31 U.S.C. § 5332(a): Bulk Cash Smuggling; 18 U.S.C. § 2(a): Aiding and Abetting; 21 U.S.C. § 853: Criminal Forfeiture; 18 U.S.C. § 924(d); 28 U.S.C. § 2461(c): Criminal Forfeiture; 18 U.S.C. § 982(a)(1): Criminal Forfeiture; 31 U.S.C. § 5332(b)(2): Criminal Forfeiture]

1 JESUS TAPIA URREA,
2 aka "JJS,"
3 aka "Ivan,"
4 aka "Chuy,"
5 aka "Pablo,"
6 RAMON GILBERTO RAMOS JR,
7 aka "Gene,"
8 aka "Gil,"
9 DAVID VINCE SORRENTINO,
10 aka "Dave,"
11 aka "Rock,"
12 RIGOBERTO VEGA TORRES,
13 aka "Rigo,"
14 aka "Chapulin,"
15 JOSE ANGEL ARAQUE MEDINA,
16 aka "Juan,"
17 aka "Modesto,"
18 EPIFANIO DONAI TOVAR,
19 THELMA KARINA GONZALEZ
20 QUINTANA,
21 FNU LNU,
22 aka "Diana Acosta,"
23 HERNAN ZERMENO,
24 aka "Pelon,"
25 HUGO ALONSO LOPEZ VALDEZ,
26 aka "Veneno,"
27 aka "Wero,"
28 aka "Guero,"
29 MARIO SANCHEZ ESPINO,
30 BORIS ANTHONY MENDEZ,
31 aka "Tony,"
32 JUAN MANUEL RODRIGUEZ,
33 aka "Arki,"
34 RUBEN BETANCOURT SOTO,
35 JUAN TALAMANTE ESPINOZA,
36 MERCEDES IVONNE MARTELL
37 OBESO,
38 aka "Meche," and
39 MANUEL GARFIAS SANCHEZ,

40 Defendants.

The Grand Jury charges:

COUNT ONE

[21 U.S.C. § 963]

Beginning on a date unknown, and continuing to in or about April 16, 2015, in Los Angeles County, within the Central District of California, and elsewhere, defendants OSCAR NOE MEDINA GONZALEZ, also known as ("aka") "Pan," aka "El Panu," LUIS FERNANDO MEZA GONZALEZ, aka "Ferras," aka "Ferrari," CARLOS ROBERTO GONZALEZ MANJARREZ, aka "Chino," aka "Cali," aka "Kali," NAYAR JOSUE BELTRAN CAMPOS, aka "NY New," CHRISTIAN JARED MARTELL OBESO, aka "FKITO," aka "Flakito," First Name Unknown ("FNU") Last Name Unknown ("LNU"), aka "Retro," HERACLIA VALENZUELA CHAPARRO, aka "Lorena," JOSE EDGAR ASTORGA HEREDIA, aka "Edgarcito," LUIS ENRIQUE SANCHEZ ROCHA, aka "Los Dos Barones," aka "El Zurdo," and others known and unknown to the Grand Jury, conspired and agreed with each other to knowingly and intentionally import the following controlled substances into the United States from a place outside thereof:

19 1. at least 500 grams of a mixture and substance
20 containing a detectable amount of methamphetamine, and at least
21 50 grams of methamphetamine, a Schedule II controlled substance,
22 in violation of Title 21, United States Code, Sections 952(a),
23 960(a)(1), and 960(b)(1)(H);

24 2. at least five kilograms of a mixture and substance
25 containing a detectable amount of cocaine, a Schedule II
26 narcotic drug controlled substance, in violation of Title 21,
27 United States Code, Sections 952(a), 960(a)(1), and
28 960(b)(1)(B);

1 3. at least one kilogram of a mixture and substance
2 containing a detectable amount of heroin, a Schedule I
3 controlled substance, in violation of Title 21, United States
4 Code, Sections 952(a), 960(a)(1), and 960(b)(1)(A); and

5 4. at least 1000 kilograms of a mixture and substance
6 containing a detectable amount of marijuana, a Schedule I
7 controlled substance, in violation of Title 21, United States
8 Code, Sections 952(a), 960(a)(1), and 960(b)(1)(G).

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1 COUNT TWO
2 [21 U.S.C. § 846]

3 Beginning on a date unknown, and continuing to in or about
4 April 16, 2015, in Los Angeles County, within the Central
5 District of California, and elsewhere, defendants OSCAR NOE
6 MEDINA GONZALEZ, also known as ("aka") "Pan," aka "El Panu,"
7 LUIS FERNANDO MEZA GONZALEZ, aka "Ferras," aka "Ferrari," CARLOS
8 ROBERTO GONZALEZ MANJARREZ, aka "Chino," aka "Cali," aka "Kali,"
9 NAYAR JOSUE BELTRAN CAMPOS, aka "NY New," CHRISTIAN JARED
10 MARTELL OBESO, aka "FKITO," aka "Flakito," First Name Unknown
11 ("FNU") Last Name Unknown ("LNU"), aka "Retro," HERACLIA
12 VALENZUELA CHAPARRO, aka "Lorena," JOSE EDGAR ASTORGA HEREDIA,
13 aka "Edgarcito," LUIS ENRIQUE SANCHEZ ROCHA, aka "Los Dos
14 Barones," aka "El Zurdo," JESUS TAPIA URREA, aka "JJS," aka
15 "Ivan," aka "Chuy," aka "Pablo," RAMON GILBERTO RAMOS JR, aka
16 "Gene," aka "Gil," DAVID VINCE SORRENTINO, aka "Dave," aka
17 "Rock," RIGOBERTO VEGA TORRES, aka "Rigo," aka "Chapulin," JOSE
18 ANGEL ARAQUE MEDINA, aka "Juan," aka "Modesto," EPIFANIO DONAI
19 TOVAR, THELMA KARINA GONZALEZ QUINTANA, FNU LNU, aka "Diana
20 Acosta," HERNAN ZERMENO, aka "Pelon," HUGO ALONSO LOPEZ VALDEZ,
21 aka "Veneno," aka "Wero," aka "Guero," MARIO SANCHEZ ESPINO,
22 BORIS ANTHONY MENDEZ, aka "Tony," and others known and unknown
23 to the Grand Jury, conspired and agreed with each other to
24 knowingly and intentionally distribute and possess with intent
25 to distribute:

- 26 1. at least 500 grams of a mixture and substance
27 containing a detectable amount of methamphetamine, and at least
28 50 grams of methamphetamine, a Schedule II controlled substance,

1 in violation of Title 21, United States Code, Sections 841(a)(1)
2 and 841(b)(1)(A)(viii);

3 2. at least five kilograms of a mixture and substance
4 containing a detectable amount of cocaine, a Schedule II
5 narcotic drug controlled substance, in violation of Title 21,
6 United States Code, Sections 841(a)(1) and 841(b)(1)(A)(ii);

7 3. at least one kilogram of a mixture and substance
8 containing a detectable amount of heroin, a Schedule I
9 controlled substance, in violation of Title 21, United States
10 Code, Sections 841(a)(1) and 841(b)(1)(A)(i); and

11 4. at least 1000 kilograms of a mixture and substance
12 containing a detectable amount of marijuana, a Schedule I
13 controlled substance, in violation of Title 21, United States
14 Code, Sections 841(a)(1) and 841(b)(1)(A)(vii).

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1 COUNT THREE
2 [21 U.S.C. §§ 841(a)(1), (b)(1)(B)(viii); 18 U.S.C. § 2(a)]
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4 On or about November 7, 2012, in Los Angeles County, within
5 the Central District of California, defendants CARLOS ROBERTO
6 GONZALEZ MANJARREZ, also known as ("aka") "Chino," aka "Cali,"
7 aka "Kali," and First Name Unknown ("FNU") Last Name Unknown
8 ("LNU"), aka "Diana Acosta," each intentionally aiding and
9 abetting the other, knowingly and intentionally distributed at
10 least five grams, that is, approximately 13.7 grams, of
11 methamphetamine, a Schedule II controlled substance.
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1 COUNT FOUR
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[21 U.S.C. §§ 841(a)(1), (b)(1)(A)(viii); 18 U.S.C. § 2(a)]

3 On or about March 10, 2013, in Los Angeles County, within
4 the Central District of California, defendants CARLOS ROBERTO
5 GONZALEZ MANJARREZ, also known as ("aka") "Chino," aka "Cali,"
6 aka "Kali," and JOSE ANGEL ARAQUE MEDINA, aka "Juan," aka
7 "Modesto," each intentionally aiding and abetting the other,
8 knowingly and intentionally possessed with intent to distribute
9 at least 50 grams, that is, approximately 6,573 grams, of
10 methamphetamine, a Schedule II controlled substance.

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1 COUNT FIVE

2 [21 U.S.C. §§ 841(a)(1), (b)(1)(A)(viii); 18 U.S.C. § 2(a)]

3 On or about June 17, 2013, in Los Angeles County, within
4 the Central District of California, defendants CARLOS ROBERTO
5 GONZALEZ MANJARREZ, also known as ("aka") "Chino," aka "Cali,"
6 aka "Kali" and RIGOBERTO VEGA TORRES, aka "Rigo," aka
7 "Chapulin," each intentionally aiding and abetting the other,
8 knowingly and intentionally possessed with intent to distribute
9 at least 50 grams, that is, approximately 1,280 grams, of
10 methamphetamine, a Schedule II controlled substance.

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1 COUNT SIX

2 [21 U.S.C. §§ 841(a)(1), (b)(1)(C); 18 U.S.C. § 2(a)]

3 On or about June 17, 2013, in Los Angeles County, within
4 the Central District of California, defendants CARLOS ROBERTO
5 GONZALEZ MANJARREZ, also known as ("aka") "Chino," aka "Cali,"
6 aka "Kali" and RIGOBERTO VEGA TORRES, aka "Rigo," aka
7 "Chapulin," each intentionally aiding and abetting the other,
8 knowingly and intentionally possessed with intent to distribute
9 approximately 63.4 grams of a mixture and substance containing a
10 detectable amount of cocaine, a Schedule II narcotic drug
11 controlled substance.

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1 COUNT SEVEN

2 [21 U.S.C. §§ 841(a)(1), (b)(1)(B)(ii); 18 U.S.C. § 2(a)]

3 On or about August 21, 2013, in Los Angeles County, within
4 the Central District of California, defendant DAVID VINCE
5 SORRENTINO, also known as ("aka") "Dave," aka "Rock," and others
6 known and unknown to the Grand Jury, each intentionally aiding
7 and abetting the other, knowingly and intentionally possessed
8 with intent to distribute at least 500 grams, that is,
9 approximately 4,941 grams, of a mixture and substance containing
10 a detectable amount of cocaine, a Schedule II narcotic drug
11 controlled substance.

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1 COUNT EIGHT
2 [21 U.S.C. §§ 841(a)(1), (b)(1)(A)(viii); 18 U.S.C. § 2(a)]
3 On or about September 8, 2013, in Los Angeles County,
4 within the Central District of California, defendants NAYAR
5 JOSUE BELTRAN CAMPOS, also known as ("aka") "NY New," LUIS
6 ENRIQUE SANCHEZ ROCHA, aka "Los Dos Barones," aka "El Zurdo,"
7 and EPIFANIO DONAI TOVAR, each intentionally aiding and abetting
8 the other, knowingly and intentionally possessed with intent to
9 distribute at least 50 grams, that is, approximately 3,567
10 grams, of methamphetamine, a Schedule II controlled substance.
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1 COUNT NINE

2 [21 U.S.C. §§ 841(a)(1), (b)(1)(A)(viii); 18 U.S.C. § 2(a)]

3 On or about October 30, 2013, in Los Angeles County, within
4 the Central District of California, defendant OSCAR NOE MEDINA
5 GONZALEZ, also known as ("aka") "Pan," aka "El Panu," and others
6 known and unknown to the Grand Jury, each intentionally aiding
7 and abetting the other, knowingly and intentionally possessed
8 with intent to distribute at least 50 grams, that is,
9 approximately 7,801 grams, of methamphetamine, a Schedule II
10 controlled substance.

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1 COUNT TEN

2 [21 U.S.C. §§ 841(a)(1), (b)(1)(B)(ii); 18 U.S.C. § 2(a)]

3 On or about February 12, 2014, in Los Angeles County,
4 within the Central District of California, defendants LUIS
5 FERNANDO MEZA GONZALEZ, also known as ("aka") "Ferras," aka
6 "Ferrari," and JESUS TAPIA URREA, aka "JJS," aka "Ivan," aka
7 "Chuy," aka "Pablo," each intentionally aiding and abetting the
8 other, knowingly and intentionally distributed at least 500
9 grams, that is, approximately 1,000 grams, of a mixture and
10 substance containing a detectable amount of cocaine, a Schedule
11 II narcotic drug controlled substance.

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1 COUNT ELEVEN

2 [21 U.S.C. §§ 841(a)(1), (b)(1)(B)(ii); 18 U.S.C. § 2(a)]

3 On or about February 12, 2014, in Los Angeles County,
4 within the Central District of California, defendants JOSE EDGAR
5 ASTORGA HEREDIA, also known as ("aka") "Edgarcito," and HUGO
6 ALONSO LOPEZ VALDEZ, aka "Veneno," aka "Wero," aka "Guero," each
7 intentionally aiding and abetting the other, knowingly and
8 intentionally possessed with intent to distribute at least 500
9 grams, that is, approximately 1,000 grams, of a mixture and
10 substance containing a detectable amount of cocaine, a Schedule
11 II narcotic drug controlled substance.

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1 COUNT TWELVE

2 [21 U.S.C. §§ 841(a)(1), (b)(1)(A)(ii); 18 U.S.C. § 2(a)]

3 On or about February 12, 2014, in Los Angeles County,
4 within the Central District of California, defendants LUIS
5 FERNANDO MEZA GONZALEZ, also known as ("aka") "Ferras," aka
6 "Ferrari," JOSE EDGAR ASTORGA HEREDIA, aka "Edgarcito," and
7 JESUS TAPIA URREA, aka "JJS," aka "Ivan," aka "Chuy," aka
8 "Pablo," each intentionally aiding and abetting the other,
9 knowingly and intentionally possessed with intent to distribute
10 at least five kilograms, that is, approximately 16.03 kilograms,
11 of a mixture and substance containing a detectable amount of
12 cocaine, a Schedule II narcotic drug controlled substance.

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1 COUNT THIRTEEN

2 [21 U.S.C. §§ 841(a)(1), (b)(1)(A)(i); 18 U.S.C. § 2(a)]

3 On or about February 12, 2014, in Los Angeles County,
4 within the Central District of California, defendants LUIS
5 FERNANDO MEZA GONZALEZ, also known as ("aka") "Ferras," aka
6 "Ferrari," JOSE EDGAR ASTORGA HEREDIA, aka "Edgarcito," and
7 JESUS TAPIA URREA, aka "JJS," aka "Ivan," aka "Chuy," aka
8 "Pablo," each intentionally aiding and abetting the other,
9 knowingly and intentionally possessed with intent to distribute
10 at least one kilogram, that is, approximately 13.26 kilograms,
11 of a mixture and substance containing a detectable amount of
12 heroin, a Schedule I narcotic drug controlled substance.

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1 COUNT FOURTEEN

2 [18 U.S.C. § 924(c)(1)(B)(i)]

3 On or about February 12, 2014, in Los Angeles County,
4 within the Central District of California, defendants LUIS
5 FERNANDO MEZA GONZALEZ, also known as ("aka") "Ferras," aka
6 "Ferrari," JOSE EDGAR ASTORGA HEREDIA, aka "Edgarcito," and
7 JESUS TAPIA URREA, aka "JJS," aka "Ivan," aka "Chuy," aka
8 "Pablo," knowingly possessed an AK-47 semiautomatic assault
9 weapon in furtherance of a drug trafficking crime, namely,
10 conspiracy to distribute controlled substances, in violation of
11 Title 21, United States Code, Section 846, as charged in Count
12 Two of this Indictment, and possession with intent to distribute
13 controlled substances, in violation of Title 21, United States
14 Code, Section 841(a)(1), as charged in Counts Twelve and
15 Thirteen of this Indictment.

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1 COUNT FIFTEEN

2 [21 U.S.C. §§ 841(a)(1), (b)(1)(A)(i); 18 U.S.C. § 2(a)]

3 On or about April 30, 2014, in Los Angeles County, within
4 the Central District of California, defendants JOSE EDGAR
5 ASTORGA HEREDIA, also known as ("aka") "Edgarcito," and RAMON
6 GILBERTO RAMOS JR, aka "Gene," aka "Gil," each intentionally
7 aiding and abetting the other, knowingly and intentionally
8 possessed with intent to distribute at least one kilogram, that
9 is, approximately 3.03 kilograms, of a mixture and substance
10 containing a detectable amount of heroin, a Schedule I narcotic
11 drug controlled substance.

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1 COUNT SIXTEEN

2 [21 U.S.C. §§ 841(a)(1), (b)(1)(A)(viii); 18 U.S.C. § 2(a)]

3 On or about June 25, 2014, in Los Angeles County, within
4 the Central District of California, defendants LUIS FERNANDO
5 MEZA GONZALEZ, also known as ("aka") "Ferras," aka "Ferrari,"
6 JESUS TAPIA URREA, aka "JJS," aka "Ivan," aka "Chuy," aka
7 "Pablo," and BORIS ANTHONY MENDEZ, aka "Tony," each
8 intentionally aiding and abetting the other, knowingly and
9 intentionally possessed with intent to distribute at least 50
10 grams, that is, approximately 156 grams, of methamphetamine, a
11 Schedule II controlled substance.

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1 COUNT SEVENTEEN

2 [21 U.S.C. §§ 841(a)(1), (b)(1)(A)(ii)]

3 On or about November 9, 2014, in Los Angeles County, within
4 the Central District of California, defendant JESUS TAPIA URREA,
5 aka "JJS," aka "Ivan," aka "Chuy," aka "Pablo," knowingly and
6 intentionally possessed with intent to distribute at least five
7 kilograms, that is, approximately 15.38 kilograms, of a mixture
8 and substance containing a detectable amount of cocaine, a
9 Schedule II narcotic drug controlled substance.

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1 COUNT EIGHTEEN

2 [21 U.S.C. § 1956(h)]

3 Beginning on a date unknown, and continuing to in or about
4 April 16, 2015, in Los Angeles County, within the Central
5 District of California, and elsewhere, defendants OSCAR NOE
6 MEDINA GONZALEZ, also known as ("aka") "Pan," aka "El Panu,"
7 LUIS FERNANDO MEZA GONZALEZ, aka "Ferras," aka "Ferrari," CARLOS
8 ROBERTO GONZALEZ MANJARREZ, aka "Chino," aka "Cali," aka "Kali,"
9 NAYAR JOSUE BELTRAN CAMPOS, aka "NY New," CHRISTIAN JARED
10 MARTELL OBESO, aka "FKITO," aka "Flakito," First Name Unknown
11 ("FNU") Last Name Unknown ("LNU"), aka "Retro," JOSE EDGAR
12 ASTORGA HEREDIA, aka "Edgarcito," LUIS ENRIQUE SANCHEZ ROCHA,
13 aka "Los Dos Barones," aka "El Zurdo," JESUS TAPIA URREA, aka
14 "JJS," aka "Ivan," aka "Chuy," aka "Pablo," RAMON GILBERTO RAMOS
15 JR, aka "Gene," aka "Gil," RIGOBERTO VEGA TORRES, aka "Rigo,"
16 aka "Chapulin," JOSE ANGEL ARAQUE MEDINA, aka "Juan," aka
17 "Modesto," EPIFANIO DONAI TOVAR, THELMA KARINA GONZALEZ
18 QUINTANA, JUAN MANUEL RODRIGUEZ, aka "Arki," RUBEN BETANCOURT
19 SOTO, JUAN TALAMANTE ESPINOZA, MERCEDES IVONNE MARTELL OBESO,
20 aka "Meche," MANUEL GARFIAS SANCHEZ, and others known and
21 unknown to the Grand Jury, conspired and agreed with each other
22 to:

23 1. knowingly and intentionally conduct financial
24 transactions, affecting interstate commerce, knowing that the
25 property involved in the financial transactions represented some
26 form of unlawful activity, and which property, in fact, involved
27 the proceeds of specified unlawful activity, that is, conspiracy
28 to distribute and distribution of controlled substances, in

1 violation of Title 21, United States Code, Sections 846 and
2 841(a)(1), and knowing that the financial transactions were
3 designed in whole and in part to conceal and disguise the
4 nature, location, source, ownership, and control of the proceeds
5 of said specified unlawful activity, in violation of Title 18,
6 United States Code, Section 1956(a)(1)(B)(i); and

7 2. knowingly and intentionally transport, transmit, and
8 transfer funds from a place in the United States to a place
9 outside of the United States, knowing that the funds involved in
10 the transportation, transmission, and transfer represented some
11 form of unlawful activity, and which funds, in fact, involved
12 the proceeds of specified unlawful activity, that is, conspiracy
13 to distribute and distribution of controlled substances, in
14 violation of Title 21, United States Code, Sections 846 and
15 841(a)(1), and knowing that such transportation, transmission,
16 and transfer was designed in whole and in part to (a) conceal
17 and disguise the nature, location, source, ownership, and
18 control of the proceeds of said specified unlawful activity, in
19 violation of Title 18, United States Code, Section
20 1956(a)(2)(B)(i), and (b) avoid a transaction reporting
21 requirement under State or Federal law, in violation of Title
22 18, United States Code, Section 1956(a)(2)(B)(ii).

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1 COUNT NINETEEN

2 [31 U.S.C. § 5332(a)]

3 On or about September 8, 2013, in Los Angeles County,
4 within the Central District of California, and elsewhere,
5 defendant LUIS ENRIQUE SANCHEZ ROCHA, also known as ("aka") "Los
6 Dos Barones," aka "El Zurdo," knowingly concealed more than
7 \$10,000 in United States currency, namely, \$14,460, in a
8 conveyance and container, that is, a Ford Fiesta rental car, and
9 attempted to transport such currency from a place within the
10 United States to a place outside of the United States with the
11 intent to evade a currency reporting requirement under Title 31,
12 United States Code, Section 5316.

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1 COUNT TWENTY

2 [31 U.S.C. § 5332(a)]

3 On or about February 12, 2014, in Los Angeles County,
4 within the Central District of California, and elsewhere,
5 defendants RUBEN BETANCOURT SOTO and JUAN TALAMANTE ESPINOZA,
6 each aiding and abetting the other, knowingly concealed more
7 than \$10,000 in United States currency, namely, \$294,634, in a
8 conveyance and container, that is, a Mitsubishi Montero, and
9 attempted to transport such currency from a place within the
10 United States to a place outside of the United States with the
11 intent to evade a currency reporting requirement under Title 31,
12 United States Code, Section 5316.

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1 FORFEITURE ALLEGATION ONE

2 [21 U.S.C. § 853]

3 1. The allegations contained in Counts One through
4 Thirteen and Fifteen through Seventeen of this Indictment are
5 hereby repeated, realleged, and incorporated by reference herein
6 as though fully set forth at length for the purpose of alleging
7 forfeiture pursuant to the provisions of Title 21, United States
8 Code, Sections 853 and 970.

9 2. Pursuant to Federal Rule of Criminal Procedure 32.2,
10 notice is hereby given to the defendants that the United States
11 will seek forfeiture as part of any sentence in accordance with
12 Title 21, United States Code, Sections 853 and 970, in the event
13 of any defendant's conviction under any of Counts One through
14 Thirteen and Fifteen through Seventeen of this Indictment.

15 3. Each defendant convicted under any of Counts One
16 through Thirteen and Fifteen through Seventeen of this
17 Indictment shall forfeit to the United States any property
18 constituting, or derived from, any proceeds the person obtained,
19 directly or indirectly, as the result of such violation and any
20 of the person's property used, or intended to be used, in any
21 manner or part, to commit, or to facilitate the commission of,
22 such violation.

23 4. Pursuant to Title 21, United States Code, Section
24 853(p), each defendant shall forfeit substitute property, up to
25 the value of the total amount described in paragraph 3, if, as
26 the result of any act or omission of said defendant, the
27 property described in paragraph 3, or any portion thereof: (a)
28 cannot be located upon the exercise of due diligence; (b) has

1 been transferred, sold to, or deposited with a third party; (c)
2 has been placed beyond the jurisdiction of the court; (d) has
3 been substantially diminished in value; or (e) has been
4 commingled with other property that cannot be subdivided without
5 difficulty.

6 5. If more than one defendant is convicted of any of the
7 offenses set forth in Counts One through Thirteen and Fifteen
8 through Seventeen of the Indictment, each such defendant shall
9 be jointly and severally liable for the entire amount ordered
10 forfeited pursuant to that Count.

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1 FORFEITURE ALLEGATION TWO

2 [18 U.S.C. § 924(d); 28 U.S.C. § 2461(c)]

3 1. The allegations contained in Counts Two and Twelve
4 through Fourteen of this Indictment are hereby repeated,
5 realleged, and incorporated by reference herein as though fully
6 set forth at length for the purpose of alleging forfeiture
7 pursuant to the provisions of Title 18, United States Code,
8 Section 924(d), and Title 28, United States Code, Section
9 2461(c).

10 2. Pursuant to Federal Rule of Criminal Procedure 32.2,
11 notice is hereby given to defendants LUIS FERNANDO MEZA
12 GONZALEZ, also known as ("aka") "Ferras," aka "Ferrari"
13 ("GONZALEZ"), JOSE EDGAR ASTORGA HEREDIA, aka "Edgarcito"
14 ("HEREDIA"), and JESUS TAPIA URREA, aka "JJS," aka "Ivan," aka
15 "Chuy," aka "Pablo" ("URREA"), that the United States will seek
16 forfeiture as part of any sentence in accordance with Title 18,
17 United States Code, Section 924(d), and Title 28, United States
18 Code, Section 2461(c), in the event of any such defendant's
19 conviction under Count Fourteen of this Indictment.

20 3. Upon conviction of the offense in violation of Title
21 18, United States Code, Section 924(c)(1)(B)(i), set forth in
22 Count Fourteen of this Indictment, defendants GONZALEZ, HEREDIA,
23 and URREA shall forfeit to the United States, pursuant to Title
24 18, United States Code, Section 924(d), and Title 28, United
25 States Code, Section 2461(c), any firearms and ammunition
26 involved in the commission of the offense, including, but not
27 limited to, the firearm identified in Count Fourteen of this
28 Indictment.

1 FORFEITURE ALLEGATION THREE
2 [18 U.S.C. § 982(a)(1)]

3 1. The allegations contained in Count Eighteen of this
4 Indictment are hereby repeated, realleged, and incorporated by
5 reference herein as though fully set forth at length for the
6 purpose of alleging forfeiture pursuant to the provisions of
7 Title 18, United States Code, Section 982(a)(1).

8 2. Pursuant to Federal Rule of Criminal Procedure 32.2,
9 notice is hereby given to defendants OSCAR NOE MEDINA GONZALEZ,
10 also known as ("aka") "Pan," aka "El Panu," LUIS FERNANDO MEZA
11 GONZALEZ, aka "Ferras," aka "Ferrari," CARLOS ROBERTO GONZALEZ
12 MANJARREZ, aka "Chino," aka "Cali," aka "Kali," NAYAR JOSUE
13 BELTRAN CAMPOS, aka "NY New," CHRISTIAN JARED MARTELL OBESO, aka
14 "FKITO," aka "Flakito," First Name Unknown ("FNU") Last Name
15 Unknown ("LNU"), aka "Retro," JOSE EDGAR ASTORGA HEREDIA, aka
16 "Edgarcito," LUIS ENRIQUE SANCHEZ ROCHA, aka "Los Dos Barones,"
17 aka "El Zurdo," JESUS TAPIA URREA, aka "JJS," aka "Ivan," aka
18 "Chuy," aka "Pablo," RAMON GILBERTO RAMOS JR, aka "Gene," aka
19 "Gil," RIGOBERTO VEGA TORRES, aka "Rigo," aka "Chapulin," JOSE
20 ANGEL ARAQUE MEDINA, aka "Juan," aka "Modesto," EPIFANIO DONAI
21 TOVAR, THELMA KARINA GONZALEZ QUINTANA, JUAN MANUEL RODRIGUEZ,
22 aka "Arki," RUBEN BETANCOURT SOTO, JUAN TALAMANTE ESPINOZA,
23 MERCEDES IVONNE MARTELL OBESO, aka "Meche," and MANUEL GARFIAS
24 SANCHEZ (collectively, "defendants"), that the United States
25 will seek forfeiture as part of any sentence in accordance with
26 Title 18, United States Code, Section 982(a)(1), in the event of
27 any such defendant's conviction under Count Eighteen of this
28 Indictment.

1 3. Pursuant to Title 18, United States Code, Section
2 982(a)(1), upon conviction of an offense in violation of Title
3 18, United States Code, Section 1956, defendants shall forfeit
4 to the United States any property, real or personal, involved in
5 such offense, and any property traceable to such property.

6 4. Pursuant to Title 21, United States Code, Section
7 853(p), each defendant shall forfeit substitute property, up to
8 the value of the total amount described in paragraph 3, if, as
9 the result of any act or omission of said defendant, the
10 property described in paragraph 3, or any portion thereof: (a)
11 cannot be located upon the exercise of due diligence; (b) has
12 been transferred, sold to, or deposited with a third party; (c)
13 has been placed beyond the jurisdiction of the court; (d) has
14 been substantially diminished in value; or (e) has been
15 commingled with other property that cannot be subdivided without
16 difficulty.

17 5. If more than one defendant is convicted of any of the
18 offenses set forth in Count Eighteen of the Indictment, each
19 such defendant shall be jointly and severally liable for the
20 entire amount ordered forfeited pursuant to that Count.

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1 FORFEITURE ALLEGATION FOUR
2 [31 U.S.C. § 5332(b) (2)]

3 1. The allegations contained in Count Nineteen of this
4 Indictment are hereby repeated, realleged, and incorporated by
5 reference herein as though fully set forth at length for the
6 purpose of alleging forfeiture pursuant to the provisions of
7 Title 31, United States Code, Section 5332(b) (2).

8 2. Pursuant to Federal Rule of Criminal Procedure 32.2,
9 notice is hereby given to defendant LUIS ENRIQUE SANCHEZ ROCHA,
10 also known as ("aka") "Los Dos Barones," aka "El Zurdo"
11 ("ROCHA"), that the United States will seek forfeiture as part
12 of any sentence in accordance with Title 31, United States Code,
13 Section 5332(b) (2), in the event of his conviction under Count
14 Nineteen of this Indictment.

15 3. Pursuant to Title 31, United States Code, Section
16 5332(b) (2), upon conviction of an offense in violation of Title
17 31, United States Code, Section 5332(a), defendant ROCHA shall
18 forfeit to the United States all property, real or personal,
19 involved in the offense and any property traceable to such
20 property.

21 4. Pursuant to Title 21, United States Code, Section
22 853(p), defendant ROCHA shall forfeit substitute property, up to
23 the value of the total amount described in paragraph 3, if, as
24 the result of any act or omission of defendant ROCHA, the
25 property described in paragraph 3, or any portion thereof: (a)
26 cannot be located upon the exercise of due diligence; (b) has
27 been transferred, sold to, or deposited with a third party; (c)
28 has been placed beyond the jurisdiction of the court; (d) has

1 been substantially diminished in value; or (e) has been
2 commingled with other property that cannot be subdivided without
3 difficulty.

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1 FORFEITURE ALLEGATION FIVE
2 [31 U.S.C. § 5332(b) (2)]

3 1. The allegations contained in Count Twenty of this
4 Indictment are hereby repeated, realleged, and incorporated by
5 reference herein as though fully set forth at length for the
6 purpose of alleging forfeiture pursuant to the provisions of
7 Title 31, United States Code, Section 5332(b) (2).

8 2. Pursuant to Federal Rule of Criminal Procedure 32.2,
9 notice is hereby given to defendants RUBEN BETANCOURT SOTO
10 ("SOTO") and JUAN TALAMANTE ESPINOZA ("ESPINOZA") that the
11 United States will seek forfeiture as part of any sentence in
12 accordance with Title 31, United States Code, Section
13 5332(b) (2), in the event of either such defendant's conviction
14 under Count Twenty of this Indictment.

15 3. Pursuant to Title 31, United States Code, Section
16 5332(b) (2), upon conviction of an offense in violation of Title
17 31, United States Code, Section 5332(a), defendants SOTO and
18 ESPINOZA shall forfeit to the United States all property, real
19 or personal, involved in the offense and any property traceable
20 to such property.

21 4. Pursuant to Title 21, United States Code, Section
22 853(p), defendants SOTO and ESPINOZA shall forfeit substitute
23 property, up to the value of the total amount described in
24 paragraph 3, if, as the result of any act or omission of
25 defendants SOTO or ESPINOZA, the property described in paragraph
26 3, or any portion thereof: (a) cannot be located upon the
27 exercise of due diligence; (b) has been transferred, sold to, or
28 deposited with a third party; (c) has been placed beyond the

jurisdiction of the court; (d) has been substantially diminished in value; or (e) has been commingled with other property that cannot be subdivided without difficulty.

4 5. If both defendants SOTO and ESPINOZA are convicted of
5 the offense set forth in Count Nineteen of the Indictment, both
6 defendants SOTO and ESPINOZA shall be jointly and severally
7 liable for the entire amount ordered forfeited pursuant to that
8 Count.

A TRUE BILL

Foreperson

STEPHANIE YONEKURA
Acting United States Attorney

ROBERT E. DUGDALE
Assistant United States Attorney
Chief, Criminal Division

KEVIN M. LALLY
Assistant United States Attorney
Chief, Organized Crime Drug
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